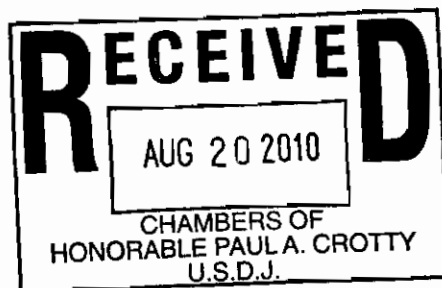


NOTICE OF MOTION FOR
ENTRY OF JUDGMENT
RECOGNIZING FOREIGN
ARBITRAL AWARD

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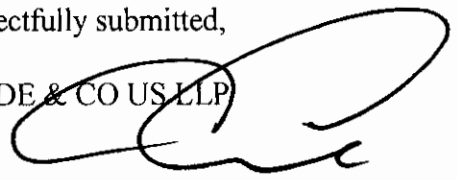
MEMO ENDORSED



Respectfully submitted,

CLYDE & CO US LLP

By


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September 20, 2010

Via Facsimile: (212) 805-6304

Honorable Paul A. Crotty
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Harpa Shipping & Chartering GmbH & Co KG "Middle East Bulk" v.
Emirates Trading Agency (L.L.C.)
Index No.: 10 CV 5792 (PAC)
Clyde & Co. Ref: 0903956/001

Dear Judge Crotty:

We represent the Petitioner Harpa Shipping & Chartering GmbH & Co KG "Middle East Bulk" in this proceeding to recognize, confirm and enforce London arbitration awards entered in favor of Petitioner and against Respondent Emirates Trading Agency (L.L.C.) ("ETA"). On August 30, 2010, we served and filed Petitioner's Notice of Motion for Entry of Judgment Recognizing Foreign Arbitral Awards and supporting documents.

Respondent ETA's time to file and serve its response to this motion expired on Friday, September 17, 2010, and ETA did not file any opposition papers or in any other way respond to the motion. Accordingly, we respectfully request that the Court grant Petitioner's motion and enter Judgment on the awards in favor of Petitioner.

Respectfully,



Christopher Carlsen

CC/mv

cc: Michael E. Unger, Esq. (Via Fax: (212) 425-1901)
Freehill Hogan & Mahar, LLP
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New York, NY 10005
Agent for Service of Process for Emirates Trading Agency (L.L.C.)